

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-D and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to prosecute their actions against them.

Respectfully:

/s/ Barbara Binis
Barbara Binis
REED SMITH
Three Logan Square, Suite 3100
1717 Arch Street
Philadelphia, PA 19103
215.851.8100 (phone)
215.851.1420 (fax)
bbinis@reedsmith.com

/s/ Erik W. Legg
Erik W. Legg
FARRELL WHITE & LEGG
P. O. Box 6457
Huntington, WV 25772-6457
304.522.9100 (phone)
304.522.9162 (fax)
EWL@farrell3.com

Attorneys for Defendant American Medical Systems, Inc.

/s/ Seth S. Webb

Seth S. Webb
BROWN & CROUPPEN
Suite 1600
211 North Broadway
St. Louis, MO 63102
314.421.0216 (phone)
314.421.4061 (fax)
sethw@getbc.com
Attorney for Plaintiffs on Exhibit A

/s/ Elizabeth L. Dudley

Elizabeth L. Dudley
THE DUDLEY LAW FIRM
Suite A
23438 SW Pilot Point Road
Douglass, KS 67039
316.746.3969 (phone)
316.746.3922 (fax)
Liz@LizDudleyLaw.com
Attorney for Plaintiffs on Exhibit B

/s/ Tony W. Edwards

Tony W. Edwards
EDWARDS LAW FIRM
Suite 1
321 South Third
McAlester, OK 74501
800.304.9246 (phone)
918.302.3701 (fax)
tedwards@edwardslawok.com
Attorney for Plaintiffs on Exhibit C

/s/ Lee B. Balefsky

Lee B. Balefsky
KLINE & SPECTER
The Nineteenth Floor
1525 Locust Street
Philadelphia, PA 19102
215.772.1000 (phone)
215.735.0960 (fax)
Lee.Balefsky@Klinespecter.com
Attorney for Plaintiffs on Exhibit D

Dated: January 22, 2016

EXHIBIT A – BROWN & CROUPPEN, P.C.

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-10154	Sharon Heitkamp v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – THE DUDLEY LAW FIRM, LLC

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-06671	Loralyn Warren, Robert Warren v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C – EDWARDS LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-02348	Connie Damberger, Michael Damberger v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT D – KLINE & SPECTER, P.C.

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-30196	Rosemary Lopez v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis
Barbara R. Binis